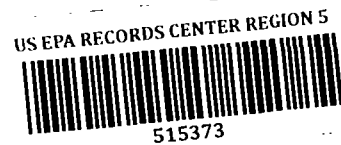


MAR - 7 1985

MEMORANDUM

SUBJECT: Expert Witness Support for Reilly Tar

FROM: Gene A. Lucero, Director *Gene A. Lucero*
Office of Waste Programs Enforcement

TO: Elizabeth Anderson, Director
Office of Health and Environmental Assessments

The Office of Waste Programs Enforcement (OWPE) is preparing for litigation on the Reilly Tar hazardous waste site in St. Louis Park, Minnesota. The case hinges on the risks posed by the polycyclic aromatic hydrocarbons (PAHs) which contaminate the groundwater beneath the site.

OWPE and Department of Justice ask that Dr. Roy Albert of your office serve as an expert witness. He is requested to address issues concerning the quantitative risk assessment of PAHs and to defend EPA policy embodied in the PAH Water Quality Criteria documents. OWPE has informally contacted Dr. Albert, and he is willing to work on the case.

If you would like more information about the case, please contact Jack Shad (382-4833) or Kate Sellers (475-8259) of OWPE. Thank you for your cooperation.

cc: David Hird, DOJ
Christopher Grundler, OWPE
Jack Shad, OWPE